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COMMENT TO CA DWR IN RE

stakeholder briefing draft of Vol. 1 of the CA Water Plan Update 2003,
an Investment Guide for CA's Water Future (Bulletin 160-03)

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DWR -"Water is California's lifeblood. Safe and sustainable water supplies are essential to provide for our growing population, to maintain agriculture and a healthy economy, and restore our environment."

--- [[This is a blatant attempt to set a wrong course for concerned citizens, journalists, politicians. Starting out with this 'profound' observation is intended to revive the many false conventional wisdoms that have been driven into the minds of Californians for a century. In fact, water is the "lifeblood" of EVERY person, state and nation. "Safe and sustainable" supplies are required in EVERY successful human society.]]

DWR -"Without wise investment decisions, California will experience a significant reduction in the quality of life, environment and economy."

--- [[This statement is true of EVERY facet of human life; If we plan poorly, we fare poorly.]]

DWR -"This update includes recommendations for investment in California's water future. Prepared with the very active participation of a broadly diverse 65 member Advisory Committee, the recommendations in this draft will be refined as the Advisory Committee* and public continue their review."

--- [[Are readers expected to see this as a product of expert water managers of the DWR or as the views of an Advisory Committee that has questionable competence when viewed as a whole? It is hoped the "refinement" will include proofreading and editing to remove verbiage.]]

DWR -"California faces many challenges. There are considerable uncertainties about the future such as the effects of groundwater contamination on our drinking water supplies and impacts of global climate change on the Sierra snow pack. In addition, existing data and analytical tools are not capable of fully answering all relevant questions."

--- [[Masterful redundancy. How many ways can the same be said without confusing the reader?]]

DWR -""For example, groundwater is being unsustainably over drafted in some areas but there is incomplete information on how much and where."

--- [[This is a certain indication of poor management by an agency that has had 100 years to get its act together. Overdrafting indicates that DWR staff has either been incompetent or has had inappropriate priorities, because far more than enough pure rainwater has been lost to avoidable evaporation than needed to balance extractions.]]

DWR -"California experiences periodic droughts, but we cannot predict when they will occur or how long they will last."

--- [[This is one of the most inane comments I've seen from public officials. How many readers of this document are smart enough to realize that rainfall is not entirely predictable?]]

DWR -""* The Advisory Committee is comprised of representatives of agriculture, urban water districts, businesses, environmentalists, Native Americans, environmental justice advocates, cities, counties, federal and State agencies, the

California Bay Delta Water Authority, academia, and different regions of the state."

--- [[Is it reasonable to assume that persons in each of these categories have sufficient knowledge of rainwater management alternatives to devise appropriate watershed management plans for each river and stream in California? If so, why haven't these plans been produced?

Such plans would fully illustrate every cost and benefit of every alternative and allow rapid downsizing of the massive bureaucracies that compose the CA DWR and SCMWD. Has DWR staff made these advisors fully aware of the designated function of California's RCDs. Are these advisors familiar with the explicit instructions given to the county flood control & water conservation districts set up by the CA Legislature half a century ago? Have they been fully and fairly informed about the costs and benefits of planning and design recommended by the USEPA and the USDA-NRCS?

If these advisors were up to speed on the above they would not have approved this document unless they are innocent or willing dupes of the business community that profits from working with agency managers to prevent the adoption of "latest and best" rainwater conservation methods.]]

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DWR - "Even so, enough information does exist for this Update to make the following important findings that can guide water investment recommendations:

DWR - 1." Throughout much of California stakeholders are working together in their regions and watersheds to develop programs that address multiple benefits."

---- [[The needed programs do not need to be "developed", they already exist in federal files. They need only to be implemented. This statement is another example of the delay/obstruction carried

out by public servants deceived or corrupted by the private sector carries out to perpetuate its control over public waters for purposes of extorting the public's wealth for unneeded services.]]

DWR - 2. "Regional integrated resources planning will play a larger role in water management."

---- [[There would no need for regional planning if each region's officials performed their duties as mandated by the State Legislature, and as expected of them by the citizenry.]]

DWR - 3. "Despite budgetary limits, the State needs to provide leadership to assure a sustainable water future for California."

---- [[The State Resource Conservation District are fully equipped to "assure a sustainable water future for California. The State's role of enforcing existing laws has prevented them from carrying out their duty to provide comprehensive watershed management planning that would bring to every citizen the most equitable and cost-effective water supply/flood control/pollution elimination possible.]]

DWR - 4. "The State has major public trust and environmental justice responsibilities and has the lead role on statewide, inter-regional and inter-state issues."

---- [[The 1945 Legislature clearly spelled out the duties of State officials. They have consistently failed to comply with the declarations of these farsighted planners.]]

DWR - 5. "The State needs to continue to provide data and other assistance to regional efforts."

---- [[This statement is ludicrous in that the State has yet to provide adequate and accurate data as directed by the Legislature. The California Water Atlas and the last three Water Plans reveal this to any impartial observer who takes the time to review the basics of rainwater conservation as ordered by the State Legislators.]]

DWR - 6. "With today's economy, State and federal assistance and funding will be more than in the recent past and beneficiaries should expect to pay a greater share for programs and projects that serve them."

---- [[This may be interpreted by some as a threat aimed at encouraging greater taxation of the public.]]

DWR -7. "California's urban areas use about the same amount of water today than they did in the mid-1990's. They have accommodated a population growth of over 3.5 million Californians largely through increased water efficiency and recycling."

---- [[The dire predictions of State officials (who serve at the whim of the business community that dictates their job security and wage through deceived-coerced-corrupted Legislators) have been consistently inaccurate. There has never been a water 'shortage' as claimed by the DWR and MWD. There has, however, been a massive water mismanagement effort by those entrusted with the task of putting California's bountiful waters to best use. The single truth that Southern California receives more than five times as much rainwater as its residents need, but makes use of just 8% of this plentiful supply, is sufficient to disprove the myths of a need for water importation to this region.]]

DWR - 6. "California's population is projected to increase by about 600,000 per year - a 50 percent increase in population by the year 2030. With currently available off-the-shelf water conservation measures, the water demand for the additional population would be between 2 to 3 million acre-feet per year."

---- [[This exaggeration may be viewed as unprofessional, absurd, or criminal, depending upon the inclination of the observer. One acre foot provides 100 gallons daily per person for nine people for one year. The 66 gallons of wastewater these people produce will

satisfy all associated business, industrial and government needs. The water demand for 600,000 people is therefore 65,000 acre-feet, NOT "between 2 and 3 million acre-feet per year".]]

DWR - 9. "California needs to reduce the unsustainable overdraft of our groundwater - that is estimated to be 1 to 2 million acre-feet in average years."

---- [[Southern California receives five times the amount needed to meet its needs annually. The USGS figures show that about half of this flows to watercourses. Are we to believe that the civil engineers of this region lack sufficient knowledge and skill to guide one gallon in five of this into aquifers to more than balance extractions that would meet all needs?]]

DWR - 10. "Existing unmet environmental water requirements need to be quantified and met."

---- [[Providing for "environmental requirements" is a game that DWR has been playing for the past decade as orchestrated by the private interests who sponsor environmental extremists to agitate earnest but uninformed citizens into noisy protests. The managers of this agency cannot claim to not know that implementation of the simplest, cheapest rainwater conservation methods known, those that have been strongly advocated by federal agencies, would produce much more than adequate water to meet all environmental needs.]]

DWR - 11. "California agriculture can be maintained with about the same amount of water it uses now. --- [[NRCS files show that California's agriculture could be achieving even higher yields than at present by using simple techniques that reduce water use by up to 95%. The savings of water in this would obviously be so great as to eliminate the contrived 'crisis' that DWR and MWD planners

have manufactured to expand their domains and perpetuate private control over the management of public water resources."

--- [[The ongoing subsidy of California's agribusinesses through provision of free water is a scandal of monumental proportion, as every normally capable person will recognize if they are willing and able to look beyond the masterfully orchestrated misinformation program of profiteers who have deceived, coerced and corrupted politicians and public servants into acceptance of a complex web of myths and false premises.]]

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DWR -"Farmers will continue substantial efficiency efforts that improve agricultural productivity."

--- [[The "substantial efforts" referred to are in truth no more than token moves to mollify environmental extremists and create an illusion of appropriate effort.]]

DWR -"Other factors such as conversion of farmland to urban uses and international trade competition are predicted to limit increases in irrigated acreage."

--- [[The prediction that increases in irrigated acreage will be "limited" reveals the moral bankruptcy of CA planners, in that these persons know perfectly well that they are misusing funds collected from Eastern states to give California agribusinesses an unfair competitive edge over farmers in these states. The tens of millions of fallow acres in states east of the Rockies that receive sufficient rain to produce crops and pasturage without irrigation are proof that the subsidies of California agribusiness have done severe and widespread damage to the economies of these states and therefore to the US economy as a whole. Billions of dollars in aid flow to these states yearly because their rural economies have been so badly damaged by the unfair competition from California's several giant agribusinesses.]]

DWR - "Based on these finding, this Update makes the following key recommendations"

The State needs to recognize the critical role regions must play and provide appropriate support.

--- [[This goes without saying, is no more than another token comment.]]

DWR - " # California needs to invest in a combination of strategies to provide 3 to 5 million acre-feet of water for increased population and correcting groundwater overdraft. An additional, currently un-quantified amount is also needed for unment environmental purposes.

--- [[These imagined "needs" are products of testimony that has been proven to be false and misleading.]]

DWR - " # This Update identifies approximately 6 to 8 million acre feet of additional annual water supply of conservation savings from strategies with High to Medium implementation confidence.

--- [[Misuse of the term "conservation" demonstrates that the authors of this document are defying the CA Legislature that defined this as "A careful preservation and protection of something. esp: planned management of a natural resource to prevent exploitation, destruction or neglect." These legislators make crystal clear their declaration of purpose, ordering that "all or any stormwaters" should be conserved - managed - by being guided into soils for storage and to prevent runoff that caused erosion, pollution and water waste]].

DWR - " Increased water use efficiency and recycling can provide up to 3 to 4 million acre-feet of that amount."

--- [[The authors of this document know that rigorous implementation of recycling would meet all needs created by increased population, while also reversing the depletion of groundwaters. Their failure to discuss this is proof that they are

derelict in their duty to fully and fairly inform elected officials and the public.]]

DWR - " # Additional strategies with Lower Implementation Confidence that may provide over 2 million acre feet of water supply and efficiency improvement should be investigated to determine if they can be relied upon." ---This proposed "investigation" is absurd in that federal officials have made it perfectly clear that the additional strategies would produce far more than a 2 million acre feet of 'new' water. DWR management has come up with a new means to bemuse and mislead readers with each Water Plan update. Their use of an IMPLEMENTATION CONFIDENCE rating to misrepresent comparable methods and the INVESTMENT GUIDE to soften up readers for the next round of unnecessary additional expenditure is a cute gimmick for the current update.

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The fact that California has a superabundance of rainwater in every region is reason to question relegating the following strategies to a minor role. Several clearly belong in the High Implementation Confidence" category.

- "Aquifer Remediation" - USGS figures show a 45-year supply of usable groundwater beneath Southern California, making this strategy a primary one for capable water managers.
- "Conveyance", defined as pumping water from one region to another to compensate for failed rainwater conservation, is contrary to both the State Water Code and common sense.
- "Drinking Water Treatment and Distribution" is a necessary strategy only in those few communities where geologic or topographic constraints limit the use of groundwater reservoirs, or

population density demands more than wells can supply. The extension of water lines throughout most suburban areas was not an appropriate reaction to a perceived need. In most cases it was the result of widespread deception, coercion and bribery of politicians and managers. A careful reading of the role of county Flood Control & Water Conservation and State Resource Conservation districts will show that this strategy is only rarely needed if these agencies properly perform the duties assigned them.

- "Economic Incentives Policy" may be considered a "strategy" if it is part of a comprehensive watershed management plan. Showing residents how they benefit from applying the most appropriate planning and design techniques is a first step in watershed planning. But a close examination of past use of this strategy will show it has brought immense unearned profit to a very few persons whose agents brazenly mislead water managers and politicians.

- "Ecosystem Restoration" is of course a matter of considerable importance, but persons who become familiar with comprehensive watershed management planning will recognize that it is but an inevitable result of the rainwater conservation (defined as "management") mandated by the 1945 Legislature.

- "Floodplain Management" is a backwards approach to dealing with rainwater, contrary to good sense because in a properly managed watershed these lands would not be flooded, most rainwater would be retained near to where it fell as ordered by the Legislature.

US ACOE files illustrate that the application of EPA and NRCS BMPs would progressively reduce the need for "managing" floodplains by eliminating floodwater flows. FEMA's files show that it would redraw its floodplain designations if a comprehensive

plan was implemented so that floodplain homes no longer need special flood insurance, and there would no longer be a need to restrict land development.

- "Matching Water Quality To Its Use" makes too little sense to be worthy of comment.

- "Pollution Prevention" is accomplished in direct ratio to the skill and energy of watershed managers. As Fresno has demonstrated with great clarity, contamination of water bodies and aquifers ceases to be a problem when ordinary retention-based planning and design is implemented with suitable rigor. Palm Desert and Santa Maria have gone even farther, making it clear that adoption of the simple Best Management Practices advocated by federal experts will both eliminate polluted runoff and recharge aquifers with pure water.

- "Recharge Area Production" is another inevitable result of implementing a comprehensive watershed management plan. Normally capable planners using the urban BMPs of the USEPA have shown that these will recharge aquifers in Southern California with more than adequate water for all needs where population density is four homes per acre or less.

- "Urban Land Use Management" as a 'strategy' is no more than applying the programs that are contained within a comprehensive watershed management plan.

- "Urban Runoff Management" is simply a matter of applying USEPA LID methods with due diligence. These are inarguably capable of making almost all communities in California self-sustaining in water supply. It is of great importance that capable and honest readers of this document recognize that this simplest and cheapest of rainwater conservation procedures also eliminates polluted runoff. The fact that it is not even mentioned as a primary

means for ensuring adequate water further diminishes the credibility of the authors of this document..

- "Water Dependent Recreation" as a 'strategy' seems to refer to letting people enjoy the benefits of springs, swamps, creeks, ponds and rivers. It seems likely this will take place without much encouragement if planners put Water of the State to proper use as directed by the CA Water Code, so that streams flow fully and stably once again.

- "Watershed Management" - The US Congress and every State Legislature cooperated to create resource conservation districts 66 years ago. This action was strengthened by the Clean Water Act of '72 creating the Presidents Council on Environmental Quality that was specifically instructed to provide expertise and funding as needed to create Comprehensive Watershed Management Plans for every District. To date, the DWR has not applied due diligence in cooperating to accomplish this end.

- "Working Lands Management" is another 'strategy' that will come into use of its own volition if planners do their jobs properly.

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DWR - "Additional surface water storage is the one strategy where there is not consensus. Advocates believe additional storage is needed to meet demands and provide greater operational flexibility."

--- [[Opponents believe that other strategies will provide sufficient supplies with less cost and environmental impact. The creation of imagined "warfare" between "opponents and advocates" of storing additional surface water is a transparent effort to polarize and distract readers of this document. Senior DWR staffers are fully aware of how best to increase groundwater storage by expanding the number of microcatchments, surface water detention/retention

ponds as small as a footprint, so as to minimize runoff and maximize aquifer recharge.]]

DWR - "This update to the Water Plan reiterates the State of California's commitment to investigating the five potential surface water reservoirs identified in the CALFED Record of Decision: Enlarged Shasta, North of Delta Storage, In Delta Storage, Enlarged Los Vaqueros Reservoir and Upper San Joaquin River Storage. Any of those proposals that meet the CALED[sic] principles, which include technical, environmental and economic feasibility, will be pursued. This Update also recognizes that local or regional groups may be investigating other potential surface water storage projects."

--- [[This document fails to discuss investigating offstream surface storage that would augment groundwater recharge by providing a stable flow to areas most suitable for this. Senior DWR officials are certainly aware that the five potential surface water reservoirs would be a far more costly option than this one and would guarantee major losses of water through evaporation.]]

DWR - "The principal recommendation of the Update is that State, federal and regional investments should target implementation of all six strategies in the High Confidence category of the Investment Guide. We should continue investing in then Medium and Lower Confidence strategies to investigate which will be prudent investment. In addition, we need to invest in the other 15 strategies that provide other important benefits, including ecosystem and watershed restoration water quality improvement, energy conservation, and increased operational flexibility."

--- [[This document recommends that everything be invested in according to the whim of DWR management, an unprofessional approach obviously designed to allow them maximum latitude for producing whatever plans their mentors in the private sector dictate.]]

DWR - " To secure California's water future, federal, State and local initiatives need to invest on the order of \$X billion per year to the year 2030, in addition to the funds needed to maintain our existing water infrastructure." ---[[This estimate that California will need to "invest" an undetermined number of billions of dollars serves to 'acclimatize' politicians to 'need' for an increased flow of dollars from the public treasury. It makes no mention of the well-understood truth that applying latest and best rainwater conservation technologies will achieve more than the needed increase in water availability while reducing the cost of land development. A fine example of this can be viewed in the beautifully sculptured lawns of Phoenix where all rain falling on new developments is detained-retained-infiltrated. The average \$5,000 per homesite savings that derive from this have been denied to Californians because their trusted officials have failed to fully and fairly illustrate all costs and benefits of onsite retention-based planning and design.]]

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